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for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant,

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation  
(Substantively Consolidated)

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

ROYAL BANK OF CANADA; GUERNROY  
LIMITED; ROYAL BANK OF CANADA  
(CHANNEL ISLANDS) LIMITED; ROYAL BANK  
OF CANADA TRUST COMPANY (JERSEY)  
LIMITED; ROYAL BANK OF CANADA (ASIA)  
LIMITED; ROYAL BANK OF CANADA (SUISSE)  
S.A.; RBC DOMINION SECURITIES INC.; and  
RBC ALTERNATIVE ASSETS, L.P.;

Defendants.

Adv. Pro. No. 12-01699 (SMB)

**STIPULATION AND ORDER EXTENDING BRIEFING SCHEDULE FOR  
TRUSTEE'S MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT**

Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff (the "Trustee") and Defendants Royal Bank of Canada, Guernroy Limited, and RBC Alternative Assets, L.P. (collectively, the "Remaining Defendants" and together with the Trustee, the "Parties"), by and through their respective undersigned counsel, agree as follows:

WHEREAS, on February 4, 2019, the Parties entered into, and this Court so-ordered, a Stipulation and Order Concerning the Trustee's Motion for Leave to File an Amended Complaint (ECF No. 103) (the "Original Stipulation");

WHEREAS, on February 25, 2019 the U.S. Court of Appeals for the Second Circuit entered a decision in *In re Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Secs. LLC* (Case No. 17-2992, Document No. 1311-1); and

WHEREAS, the Parties seek to extend the briefing schedule set forth in the Original Stipulation for a short period to allow them to determine the appropriate next steps in this action in light of the Second Circuit's decision;

IT IS HEREBY STIPULATED AND AGREED that:

1. The Trustee shall file his motion for leave to file an amended complaint on or before April 10, 2019, and the Remaining Defendants shall file their opposition to the motion on or before June 5, 2019. The Trustee shall file a reply on or before July 3, 2019.
2. The extension of time granted by this stipulation (the "Stipulation") is without prejudice to any future extensions of time.

3. Entry into this Stipulation shall not impair or otherwise impact the Trustee's and the above-captioned defendants' (collectively, "Defendants")<sup>1</sup> rights and defenses, including without limitation, defenses based on jurisdiction and venue.

4. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original.

Dated: March 6, 2019  
New York, New York

/s/ Howard L. Simon  
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Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Estate of Bernard L.  
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*Attorneys for Defendants*

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<sup>1</sup> Banque SYZ SA is successor to Royal Bank of Canada (Suisse) S.A. The Second Circuit approved a motion to substitute Royal Bank of Canada Singapore Branch for Royal Bank of Canada (Asia) Limited. Accordingly, "Defendants" refers to Royal Bank of Canada, Guernsey Limited, Royal Bank of Canada (Channel Islands) Limited, Royal Bank of Canada Trust Company (Jersey) Limited, Banque SYZ SA as successor to Royal Bank of Canada (Suisse) S.A., Royal Bank of Canada Singapore Branch, RBC Dominion Securities Inc., and RBC Alternative Assets, L.P.

SO ORDERED: March 6<sup>th</sup>, 2019

/s/ STUART M BERNSTEIN

Hon. Stuart M. Bernstein  
United States Bankruptcy Judge